



# City of Seattle

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## Seattle City Light

June 28, 2010

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
4545 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

RE: ET Docket No. 10-123—Office of Engineering and Technology Requests Information on  
Use of 1675-1710 MHz Band

Dear Ms. Dortch:

The NOAA Geostationary Operational Environmental Satellites Data Collection System (GOES DCS) serves as the primary conduit for meteorological, hydrological and seismic data collected by the federal government. One of the frequencies proposed by the National Telecommunications and Information Administration (NTIA) for possible use by commercial services, 1675 MHz to 1710 MHz, is the downlink on the GOES DCS to receiving stations on the earth for environmental data transmissions.

Of extreme importance to Seattle City Light is the U.S. Geological Survey (USGS) real-time streamgauge data. The USGS receives streamflow, stage, and precipitation data from many stream sites. City Light relies on this data to maintain reliable service to its electric customers and to protect endangered species.

Sharing of this bandwidth could disrupt transmission of critical stream flow information. Moving the USGS off this spectrum band would also negatively affect stream flow information, as GOES users would lose the ability to download data directly from the GOES DCS and would have to rely on a private vendor and the internet for data. Reliance of the USGS on the internet to transmit GOES data is risky, especially during storm events when users most need the USGS data. If the radio frequencies for data transmission were moved to another frequency, all monitoring site radios would have to be replaced and reprogrammed. Costs to City Light, as a USGS streamgaging funding partner, would increase.

City Light requests that the 1675-1720 MHz band be preserved for public use for the transmission of environmental data.

Sincerely,  
Robert W. Cromwell, Jr., Director, Power Contracts & Resource Acquisition Division



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